



Duquesne Light

Nuclear Construction Division
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September 6, 1985

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

ATTENTION: Mr. Richard W. Starostecki
Division of Project and Resident Programs

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
USNRC IE Inspection Report No. 50-412/85-14

REFERENCE: NRC Inspection 50-412/85-14, dated August 6, 1985

Gentlemen:

This is in response to the Notice of Violation cited in Inspection No. 50-412/85-14 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. J. J. Carey, dated August 6, 1985.

Notice of Violation 85-14-01: "Insufficient Clearance Around Welds - PSI Related"

Violation:

10CFR50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures ... and shall be accomplished in accordance with these instructions, procedures, or drawings.

Specification 2BVS-920 requires that minimum longitudinal clear access equal to 4 Tn +2" be provided for welds which require surface or volumetric inservice inspection.

Contrary to the above, during the period from June 24-28, 1985, pipe support 2RCS-PSSP007X, reactor building elevation 783' 7-1/2", and pipe support 2RCS-PSR-036, reactor building elevation 783' 6" were found to obstruct 6" diameter shop weld A, line 2RCS-006-107-1, and 3" diameter weld 2RCS-109-F500, respectively, such that the required longitudinal minimum clear access was not provided for the welds.

Response:

As cited in this violation, minimum specified longitudinal access to the subject welds was not maintained when pipe supports 2RCS-PSSP-007X and 2RCS-PSR-036 were installed. FCP-208, "Control of Fabrication and

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Installation Processes for Piping Systems," identifies access requirements and the need to obtain Engineering resolution when access could not be maintained. A review of FCP-207, "Component Support Control," indicated that this FCP had not identified such requirements. To strengthen DLC's program, FCP-207 will be revised to include these requirements/procedures, and necessary training of personnel will be completed by September 30, 1985. The FCP-207 revision, 2BVS-920 revision, and SQC Inspection Plans 7.2 and 7.3.1, which have already been revised to change inspection attributes for minimum clear access to welds, should prevent recurrence of any similar problem. In addition, the preservice inspection plan will include an appropriate attribute to assure that the spatial envelope is acceptable for each weld requiring inspection prior to performing the initial PSI.

In regards to the related Unresolved Item 85-14-02, the project is evaluating existing procedures to determine what additional measures are required to ensure all discipline installation activities are completed without adversely affecting the weld accessibility envelope. The results of this evaluation will be made available to the NRC Senior Resident Inspector upon request.

DUQUESNE LIGHT COMPANY

By J. J. Carey
J. J. Carey
Vice President

SDH/wjs

cc: Mr. J. M. Taylor, Director (3)
Mr. B. K. Singh, Project Manager
Mr. G. Walton, NRC Resident Inspector
INPO Records Center
NRC Document Control Desk

SUBSCRIBED AND SWORN TO BEFORE ME THIS
6th DAY OF September, 1985.

Anita Elaine Reiter
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 16th day of September, 1985, before me, a
Notary Public in and for said Commonwealth and County, personally appeared
J. J. Carey, who being duly sworn, deposed and said that (1) he is Vice
President of Duquesne Light, (2) he is duly authorized to execute and file
the foregoing Submittal on behalf of said Company, and (3) the statements set
forth in the Submittal are true and correct to the best of his knowledge.

Anita Elaine Reiter
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986